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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE CITY AND COUNTY OF SAN FRANCISCO

10 THE PEOPLE OF THE STATE OF
CALIFORNIA, by and through the
11 CALIFORNIA CORPORATIONS
COMMISSIONER,
12

Plaintiff,
13

14 vs.

15 CORBINMOTORS.COM, INC., CORBIN
MOTORS, INC., THOMAS W. HANAGAN
16 AKA TOM CORBIN, JENNIFER J.
WILSON, BAY CITY DEVELOPMENT
17 CORPORATION, MICHAEL HANAGAN
AKA MIKE CORBIN, MICHAEL
18 D'ANDREA, CORBIN MOTORS DAYTONA
BEACH, INC., FRANK ANTHONY LUZI,
19 JR. AKA ANTHONY LUZI and DOES 1
through 90, inclusive
20

Defendants.
21

Case No.: CGC 03420165

**FIRST AMENDED COMPLAINT FOR
TEMPORARY RESTRAINING ORDER;
PRELIMINARY INJUNCTION;
PERMANENT INJUNCTION; CIVIL
PENALTIES; AND ANCILLARY RELIEF**

[Securities Litigation (28)]
(Corporations Code §§ 25110, 25401,
25535, 31110, 31201, 31405)

22
23 Demetrios A. Boutris, California Corporations Commissioner, acting to protect the
24 public from the unlawful and fraudulent sale of unqualified securities and franchises and
25 unlicensed activity by natural persons involved in the securities and franchise businesses,
26 brings this action in the public interest in the name of the People of the State of California.
27 The People of the State of California allege:
28

FACTUAL SUMMARY

1
2 1. Since its inception in 1999, Defendant CorbinMotors.com, Inc., operated principally
3 by Defendant Thomas W. Hanagan aka Tom Corbin in Hollister, California, has raised more
4 than \$10 million by selling unqualified stock in the car-manufacturing portion of the company
5 and by selling unregistered franchises in car dealerships. CorbinMotors.com, Inc., was
6 apparently formed initially to produce the Sparrow, an electric, single seat commuter vehicle
7 with three wheels, and which was featured in the most-recent Austin Powers movie.
8 Defendants have managed to manufacture less than 300 vehicles, many of which have
9 been returned with significant mechanical problems. Repairs often take months, if done at
10 all. Many franchise dealers have received either no vehicles or not enough vehicles to
11 conduct business. Defendants have received many thousands of dollars in deposits, but
12 orders remain unfilled. Defendants have omitted or misrepresented the true facts
13 concerning the performance and health of the company to potential investors and
14 franchisees. Defendants have ignored or violated the qualification and registration
15 requirements of the Department of Corporations by their behavior, including but not limited
16 to bringing tours of senior citizens through the factory to market and sell stock. Company
17 assets have been misdirected to fund the lifestyles of Defendant Thomas W. Hanagan aka
18 Tom Corbin, his family, and a small inner circle. By this action, the California Corporations
19 Commissioner seeks to freeze the assets of Defendants, to compel Defendants to disgorge
20 profits, and to enjoin Defendants from such behavior on a permanent basis.
21

VENUE AND JURISDICTION

22
23 2. Plaintiff, by this action and pursuant to Corporations Code §25530 and §31400,
24 seeks to enjoin defendants: 1) from effecting transactions in securities in this state which
25 have not been properly qualified and/or which are not exempt from qualification; 2) from
26 offering and selling securities by means of misrepresentations or omissions of material
27 facts; 3) from selling franchises in this state without offers of same having been registered
28 with the Corporations Commissioner; and 4) from offering or selling franchises by means of

1 misrepresentations or omissions of material facts. Plaintiff also seeks civil penalties
2 pursuant to Corporations Code §25535 and §31405.

3
4 3. Defendant Thomas W. Hanagan aka Tom Corbin, and Does 1 through 10, inclusive,
5 (hereinafter collectively referred to as "Tom Corbin") are natural persons residing in the
6 County of San Benito. Tom Corbin at all times mentioned herein has engaged in unlawful
7 activity throughout the State of California and in other states, while domiciled in the County
8 of San Benito, State of California. The transactions, which involved violations of law
9 hereinafter described, were conducted in various counties in the State of California,
10 including the City and County of San Francisco and by electronic mail and over the Internet.
11 Plaintiff is informed and believes, and thereon alleges, that Tom Corbin was the principal
12 control person of activities involving all defendants which were intended to defraud investors
13 and franchisees with the offer and sale of securities and franchises of Corbin Motors and
14 CorbinMotors.com.

15 4. Defendant Jennifer J. Wilson, and Does 11 through 20, inclusive, (hereinafter
16 collectively referred to as "Wilson") are natural persons residing in the County of San Benito,
17 State of California. Wilson is the wife of Tom Corbin. Wilson at all times mentioned herein
18 has engaged in unlawful activity throughout the State of California and in other states, while
19 domiciled in the County of San Benito, State of California. The transactions, which involved
20 violations of law hereinafter described, were conducted in various counties in the State of
21 California, including the City and County of San Francisco and by electronic mail and over
22 the Internet. Plaintiff is informed and believes, and thereon alleges, that Wilson has
23 assisted and abetted Tom Corbin in unlawfully holding or disposing of assets of Corbin
24 Motors and/or CorbinMotors.com, Inc., including the purchase of numerous pieces of real
25 property with the assets of Corbin Motors and/or CorbinMotors.com.

1 5. Defendant CorbinMotors.com, Inc. and Does 21 through 30, inclusive, (hereinafter
2 collectively referred to as "CorbinMotors.com") are, and at all times mentioned herein, were
3 corporations licensed to conduct business in the State of California with a principal place of
4 business of Hollister, County of San Benito, State of California. Plaintiff is informed and
5 believes, and thereon alleges, that CorbinMotors.com was utilized by Tom Corbin and other
6 defendants to offer and sell unregistered securities in California and other states, and as an
7 alter ego of Tom Corbin was used to defraud investors and franchisees with sales of
8 securities and franchises.

9 6. Defendant Corbin Motors, Inc. and Does 31 through 40, inclusive, (hereinafter
10 collectively referred to as "Corbin Motors") were at all times mentioned herein corporations
11 licensed to conduct business in the State of California with a principal place of business of
12 Hollister, County of San Benito, State of California. Plaintiff is informed and believes, and
13 thereon alleges, that Corbin Motors was utilized by Tom Corbin and other defendants to
14 offer and sell unregistered securities in California and other states, and as an alter ego of
15 Tom Corbin was used to defraud investors and franchisees with sales of securities and
16 franchises.

17 7. Defendant Bay City Development Corporation and Does 41 through 50, inclusive,
18 (hereinafter collectively referred to as "Bay City") were at all times mentioned herein
19 corporations licensed to conduct business in the State of California, with a principal place of
20 business in San Juan Bautista, California. Defendant Wilson is the registered agent for
21 service of process for Defendant Bay City. Plaintiff is informed and believes, and thereon
22 alleges, that Bay City is an alter ego of Wilson and Tom Corbin, and that Bay City has been
23 used by Wilson and Tom Corbin to unlawfully hold or dispose of assets of Corbin Motors
24 and CorbinMotors.com.

1 8. Defendant Michael Hanagan aka Mike Corbin and Does 51 through 60, inclusive,
2 (hereinafter collectively referred to as "Mike Corbin") are natural persons believed to be
3 residing in the County of San Benito, State of California. Mike Corbin at all times mentioned
4 herein has engaged in unlawful activity throughout the State of California and in other
5 states, while domiciled in the County of San Benito, State of California. The transactions,
6 which involved violations of law hereinafter described, were conducted in various counties in
7 the State of California, including the City and County of San Francisco and by electronic
8 mail and over the Internet. Plaintiff is informed and believes, and thereon alleges, that Mike
9 Corbin has assisted and abetted Tom Corbin in holding or disposing of assets of Corbin
10 Motors and/or CorbinMotors.com, Inc., and in the unlawful and fraudulent sale of securities
11 and franchises, including but not limited to times during which he acted in the capacity of a
12 director of said entities, and in his capacity as a principal of Corbin Pacific, Inc.

13 9. Defendant Michael D'Andrea and Does 61 through 70, inclusive, (hereinafter
14 collectively referred to as "D'Andrea") are natural persons believed to be residing in the
15 County of San Benito, State of California. D'Andrea at all times mentioned herein has
16 engaged in unlawful activity throughout the State of California and in other states, while
17 domiciled in the County of San Benito, State of California. The transactions, which involved
18 violations of law hereinafter described, were conducted in various counties in the State of
19 California, including the City and County of San Francisco and by electronic mail and over
20 the Internet. Plaintiff is informed and believes, and thereon alleges, that D'Andrea is and
21 has been an officer and/or a member of the control group of Corbin Motors and
22 CorbinMotors.com, and has assisted and abetted Tom Corbin in unlawfully holding or
23 disposing of assets of Corbin Motors and/or Corbinmotors.com, and in the unlawful and
24 fraudulent sale of securities and franchises.

10. Defendant Corbin Motors Daytona Beach, Inc. and Does 71 through 80, inclusive, (hereinafter collectively referred to as "Corbin Motors Daytona Beach") are, and at all times mentioned herein, corporations licensed to conduct business in the State of Florida. Plaintiff is informed and believes, and thereon alleges, that Corbin Motors Daytona Beach was utilized by Tom Corbin and other defendants to offer and sell unregistered securities and franchises in California and other states, and as an alter ego of Tom Corbin was used to defraud investors and franchisees with unlawful sales of securities and franchises including but not limited to by electronic mail and over the Internet, and/or to hold or dispose of assets of Corbin Motors or CorbinMotors.com.

11. Defendant Frank Anthony Luzi, Jr. aka Anthony Luzi and Does 81 through 90 (hereinafter collectively referred to as "Luzi") are natural persons residing in the State of California, and were, at all times mentioned, an officer or control person of Corbin Motors Daytona Beach. Plaintiff is informed and believes, and thereon alleges, that Luzi has engaged in unlawful activity throughout the State of California and in other states. The transactions, which involved violations of law hereinafter described, were conducted in various counties in the State of California, including the City and County of San Francisco and by electronic mail and over the Internet. Plaintiff is informed and believes, and thereon alleges, that Luzi has assisted and abetted Tom Corbin in holding or disposing of assets of Corbin Motors and/or CorbinMotors.com, Inc, and in the fraudulent sale of securities and franchises.

12 Defendants sued herein under the fictitious names Does 1 through 90, inclusive, are unknown to plaintiff who therefore sues such defendants by such fictitious names. Plaintiff will amend this complaint to show the true name of each such defendant when the same has been ascertained. Plaintiff is informed and believes, and thereon alleges, that all defendants, including the Doe defendants, were at all times mentioned, principals, agents, employers, employees, co-venturers, or co-conspirators, and were acting in their respective capacities in doing the acts complained of, thereby imputing liability to each other.

13. Defendants Corbin Motors and CorbinMotors.com are companies whose stated purpose was to develop, produce, and sell the Sparrow and Sparrow II, both single-seat all-electric battery-powered vehicles for use by the public, and more recently the Merlin vehicle.

FIRST CAUSE OF ACTION

UNLAWFUL OFFER AND SALE OF UNQUALIFIED NONEXEMPT SECURITIES
(Corporations Code §25110)
AS AGAINST DEFENDANTS CORBINMOTORS.COM, CORBIN MOTORS, TOM CORBIN,
MIKE CORBIN, WILSON, D'ANDREA AND LUZI

14. Plaintiff realleges and reincorporates herein by reference paragraphs 1 through 13, inclusive, as though set forth at length herein.

15. Corporations Code §25110 makes it unlawful to offer or sell nonexempt, unqualified securities. That section states in part:

It is unlawful for any person to offer or sell in this state any security in an issuer transaction (other than in a transaction subject to Section 25120), whether or not by or through underwriters, unless such sale has been qualified under Section 25111, 25112 or 25113 (and no order under Section 25140 or subdivision (a) of Section 25143 is in effect with respect to such qualification) or unless such security or transaction is exempted or not subject to qualification under Chapter 1 (commencing with Section 25100) of this part.

Corporations Code §25535 states:

(a) Any person who violates any provision of this law, or who violates any rule or order under this law, shall be liable for a civil penalty not to exceed twenty-five thousand dollars (\$25,000) for each violation, which shall be assessed and recovered in a civil action brought in the name of the people of the State of California by the commissioner in any court of competent jurisdiction.

16. Beginning at an exact date that is unknown to plaintiff, but at least since April 10, 1999, and continuing until at least December 2002, Defendants Corbin Motors, CorbinMotors.com, Tom Corbin, Mike Corbin, Wilson, D'Andrea, and Luzi unlawfully offered and sold to more than 35 people unqualified, nonexempt securities issued by CorbinMotors.com and/or Corbin Motors amounting to more than \$10,000,000 (ten million dollars.)

17. Defendants' pattern of conduct, as set forth above and as alleged elsewhere herein,

demonstrates the necessity for granting injunctive and ancillary relief restraining such and similar acts in violation of §25110, and providing restitution or disgorgement to investors, as well as imposition of appropriate civil penalties.

WHEREFORE, Plaintiff prays for judgment as more fully set forth below.

SECOND CAUSE OF ACTION

**UNLAWFUL OFFER AND SALE OF SECURITIES BY MEANS OF UNTRUE
STATEMENTS OR OMISSIONS OF MATERIAL FACT
(Corporations Code §25401)**

**AS AGAINST DEFENDANTS CORBINMOTORS.COM, CORBIN MOTORS, TOM CORBIN,
MIKE CORBIN, WILSON, D'ANDREA AND LUZI**

18. Plaintiff realleges and reincorporates herein by reference paragraphs 1 through 17, inclusive, as though set forth at length herein.

19. Corporations Code §25401 makes it unlawful to offer or sell securities by means of untrue statements or omissions of material fact. This section states:

It is unlawful for any person to offer or sell a security in this state or buy or offer to buy a security in this state by means of any written or oral communication which includes an untrue statement of a material fact or omits to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading.

20. Beginning at an exact date that is unknown to plaintiff, but at least since April 10, 1999, and continuing until at least December 2002, Defendants Corbin Motors, CorbinMotors.com, Tom Corbin, Mike Corbin, Wilson, D'Andrea, and Luzi, and each of them, offered and sold to the investing public of California and other states public securities in the form of stock in CorbinMotors.com and Corbin Motors by means of untrue statements of material fact and omissions of material facts.

21. Said Defendants made misrepresentations of material facts, or omitted to state material facts to prospective investors, including but not limited to the following:

- a. The investment was not high risk. In fact, the investment was very unsafe, because Corbin Motors and CorbinMotors.com have consistently been heavily in debt, and have accumulated such heavy liabilities as to seriously affect the

ability of those companies to produce and deliver vehicles.

b. The invested funds would be used for the purpose of developing and producing the Sparrow and Sparrow II vehicles. In fact, the defendants have shifted focus away from producing any Sparrows at all to produce other models considered more salable or profitable, leaving Sparrow purchasers and franchisees with no vehicles.

c. The company was healthy and in need of funds only to expand and grow. In fact, Corbin Motors and CorbinMotors.com have been in dire economic condition for most of their existence, and have used incoming cash primarily to pay debts and fund the lifestyles of officers and controlling persons, including defendants.

22. Defendants' pattern of conduct, as set forth above and as alleged elsewhere herein, demonstrates the necessity for granting injunctive and ancillary relief restraining such and similar acts in violation of §25401, and providing restitution or disgorgement to franchisees, as well as imposition of appropriate civil penalties.

WHEREFORE, Plaintiff prays for judgment as more fully set forth below.

THIRD CAUSE OF ACTION

UNLAWFUL OFFER AND SALE OF UNREGISTERED NONEXEMPT FRANCHISES
(Corporations Code §31110)

AS AGAINST DEFENDANTS CORBINMOTORS.COM, CORBIN MOTORS, TOM CORBIN,
WILSON, MIKE CORBIN, D'ANDREA, CORBIN MOTORS DAYTONA BEACH, AND LUZI

23. Plaintiff realleges and reincorporates herein by reference paragraphs 1 through 22, inclusive, as though set forth at length herein.

24. Corporations Code §31110 makes it unlawful to offer or sell unregistered non-exempt franchises. That section states:

On or after April 15, 1971, it shall be unlawful for any person to offer or sell any franchise in this state unless the offer of the franchise has been registered under this part or exempted under Chapter 1 (commencing with Section 31100) of this part.

Corporations Code §31405 states in pertinent part:

- (a) Any person who violates any provision of this law, or who violates any rule or order made under this law, shall be liable for a civil penalty not to exceed two thousand five hundred dollars (\$2,500) for each violation, which shall be assessed and recovered in a civil action brought in the name of the people of the State of California by the commissioner in any court of competent jurisdiction.

25. Beginning at an exact date that is unknown to plaintiff, but at least since April 10, 1999, and continuing until at least December 2002, Defendants CorbinMotors.com, Corbin Motors, Tom Corbin, Wilson, Mike Corbin, D'Andrea, Corbin Motors Daytona Beach, and Luzi, and each of them, unlawfully offered and sold unregistered nonexempt franchises in the State of California.

26. Defendants' pattern of conduct, as set forth above and as alleged elsewhere herein, demonstrates the necessity for granting injunctive and ancillary relief restraining such and similar acts in violation of §31110, and providing restitution or disgorgement to franchisees, as well as imposition of appropriate civil penalties.

WHEREFORE, Plaintiff prays for judgment as more fully set forth below.

FOURTH CAUSE OF ACTION

UNLAWFUL OFFER AND SALE OF FRANCHISES BY MEANS OF UNTRUE STATEMENTS OR OMISSIONS OF MATERIAL FACT

(Corporations Code §31201)

AS AGAINST DEFENDANTS CORBINMOTORS.COM, CORBIN MOTORS, TOM CORBIN, WILSON, MIKE CORBIN, D'ANDREA, CORBIN MOTORS DAYTONA BEACH, AND LUZI

27. Plaintiff realleges and reincorporates herein paragraphs 1 through 27, inclusive, as though set forth at length herein.

28. Corporations Code §31201 makes it unlawful to offer and sell franchises by means of untrue statements or omissions of material fact. This section states:

It is unlawful for any person to offer or sell a franchise in this state by means of any written or oral communication not enumerated in Section 31200 which includes an untrue statement of a material fact or omits to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading.

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2 29. Beginning at an exact date that is unknown to plaintiff, but at least since April 10,
3 1999, and continuing until at least December 2002, Defendants CorbinMotors.com, Corbin
4 Motors, Tom Corbin, Wilson, Mike Corbin, D'Andrea, Corbin Motors Daytona Beach, and
5 Luzi, and each of them, offered and sold franchises in this State by means of untrue
6 statements of material fact and omissions of material facts.

7 30. Said defendants made misrepresentations of material fact, or omitted to state
8 material facts, including but not limited to the following:

- 9 a. CobinMotors.com and Corbin Motors would provide sufficient vehicles for the
10 franchisees to conduct viable business as dealers of the Sparrow and Sparrow II.
11 In fact, many franchisees received no vehicles at all or received too few vehicles
12 to conduct a viable business.
- 13 b. CorbinMotors.com and Corbin Motors would provide repair assistance and
14 warranty support for the dealers to service and repair vehicles sold by the
15 franchisees. In fact, no such repair assistance and warranty support were ever
16 provided. Vehicles with problems had to be shipped to the Hollister Corbin
17 Motors facility, where they frequently sat for months. Plaintiff is informed and
18 believes, and thereon alleges, that vehicles were frequently repaired by using
19 parts taken from newly arrived vehicles with other problems.
- 20 c. CorbinMotors.com and Corbin Motors were healthy and in need of funds only to
21 expand and grow. In fact, Corbin Motors and CorbinMotors.com have been in
22 dire economic condition for most of their existence, and have used incoming cash
23 primarily to pay debts and fund the lifestyles of officers and controlling persons,
24 including defendants.

25 31. Defendants' pattern of conduct, as set forth above and as alleged elsewhere herein,
26 demonstrates the necessity for granting injunctive and ancillary relief restraining such and
27 similar acts in violation of §31201, and providing restitution or disgorgement to franchisees,
28 as well as imposition of appropriate civil penalties.

1 WHEREFORE, Plaintiff prays for judgment as more fully set forth below.

2 **PRAYER**

3 WHEREFORE, plaintiff prays for judgment against defendants, and each of them, as
4 follows:

5 1. For a temporary restraining order and/or order of preliminary injunction
6 restraining and enjoining all Defendants, their officers, directors, successors in interest,
7 agents, employees, attorneys in fact, and all persons acting in concert or participating with
8 them, or any of them, from directly or indirectly:

9 a. Violating Corporations Code §25110 by offering or selling securities
10 without that security being qualified pursuant to the Corporate Securities Law of 1968, or
11 unless exempt;

12 b. Violating Corporations Code § 25401 by offering or selling any
13 securities by means of any written or oral communication which includes an untrue
14 statement of a material fact or omits to state a material fact necessary in order to make the
15 statements made, in light of the circumstances under which they were made, not
16 misleading;

17 c. Violating Corporations Code §31110 by offering or selling franchises
18 without that franchise being registered pursuant to the Corporate Securities Law of 1968, or
19 unless exempt;

20 d. Violating Corporations Code §31201 by offering or selling franchises in
21 this State by means of untrue statements of material fact or omissions of material facts;

22 e. Removing, destroying, mutilating, concealing, altering, transferring, or
23 otherwise disposing of, in any manner, any books, records, documents, correspondence,
24 brochures, manuals, or other documentation of any kind in the possession, custody or
25 control of any of the Defendants.

26 f. Transferring, changing, disbursing, selling, dissipating, converting,
27 pledging, assigning, foreclosing or otherwise disposing of any real or personal property or
28 other assets, in their possession or under their control, or in the possession of, or under the

1 control of, any of them, which property or other assets are or were to be held for the benefit
2 of defendants' investors, franchisees and/or creditors, or by any person for the benefit of
3 any investors, franchisees and/or creditors of defendants, and each of them, whether in
4 trust or otherwise.

5 g. Withdrawing from any bank account, transferring, changing, disbursing,
6 selling, dissipating, converting, pledging, assigning, foreclosing, or otherwise disposing of
7 any real property or personal property in their possession or under their control, or in the
8 possession of, or under the control of, any of the Defendants, which property or other assets
9 were derived or emanated from directly, or indirectly, the sale or purchase or offer to sell or
10 purchase any security under California law;

11 2. For an Order that, pursuant to section 25535 of the Corporations Code
12 Defendants, and each of them, individually, jointly and severally, pay to the Department of
13 Corporations, a civil penalty in the maximum sum of \$25,000 (Twenty-five Thousand
14 Dollars) for each act in violation of Corporations Code Section 25110, and a maximum of
15 \$25,000 (Twenty-five Thousand Dollars) for each act in violation of Corporations Code
16 Section 25401, as authorized by Corporations Code Section 25535.

17 3. For an Order that Defendants CorbinMotors.com, Corbin Motors, Tom Corbin,
18 Wilson, Mike Corbin, D'Andrea, Corbin Motors Daytona Beach, and Luzi, and each of them,
19 individually, jointly and severally, pay to the Department of Corporations, a civil penalty in
20 the maximum sum of \$2,500 (Two Thousand Five Hundred Dollars) for each violation of
21 Corporations Code §31110, and a civil penalty in the maximum sum of \$2,500 (Two
22 Thousand Five Hundred Dollars) for each violation of Corporations Code §31201, as
23 authorized by Corporations Code §31405.

24 4. That pursuant to Sections 25530(b) and 31400 (b) of the Corporations Code,
25 defendants, and each of them, be ordered to disgorge all profits and compensation obtained
26 as a result of the violations of law complained of herein, all in the amounts and manner
27 provided for by law.

28

5. For an order requiring defendants to make restitution to the investors and franchisees in the principal amount paid by each investor to whom securities were sold and each franchisee to whom a franchise was sold by means of the unlawful conduct of defendants, described herein, less the amount of any repayment of principal to any such person by any defendant named in this Complaint, with interest from the date of investment on the amount of principal contribution remaining unpaid.

AS AGAINST DEFENDANTS CORBINMOTORS.COM, CORBIN MOTORS, INC., TOM CORBIN, JENNIFER J. WILSON, BAY CITY DEVELOPMENT CORPORATION, AND CORBIN MOTORS DAYTONA BEACH, INC.'

1. For a Temporary Restraining Order, Preliminary Injunction and Permanent Injunction placing an immediate freeze on all funds, negotiable instruments and/or assets held in any bank or other accounts, certificates of deposit or otherwise, without limitation, in the name of or for the benefit of defendants CorbinMotors.com, Inc., Corbin Motors, Inc., Tom Corbin, Jennifer J. Wilson, Bay City Development Corporation and Corbin Motors Daytona Beach, Inc.

2. That plaintiff recover its costs of suit herein, including costs of investigation;

3. For such and further relief as the court may deem just and proper.

DATED: May 7, 2003

DEMETRIOS A. BOUTRIS
California Corporations Commissioner

By: _____
DOUGLAS M. GOODING
Corporations Counsel
Attorney for the People
of the State of California